

***D. GEORGE SWEIGERT  
GENERAL DELIVERY  
NEVADA CITY, CA 95959***

**February 26, 2021**

**Magistrate Judge Stewart D. Aaron  
U.S. District Court  
500 Pearl Street  
New York, New York 10007-1312**

**SUBJ: PLAINTIFF'S OBJECTIONS TO PROPOSED WITNESS LIST  
(See Dkt. 204, item (1)(a)); 1:18-cv-08653-VEC-SDA**

**Your Honor,**

1. As a courtesy to this Court, the Plaintiff wishes to help clarify an issue with the witness list that has been proposed by the Defendant. This letter provides the Defendant with adequate notice as to the Plaintiff's desire to discuss the witness list at the Discovery Conference planned for March 11, 2021.

2. The Defendant has proposed the following witnesses (see **Dkt. 204, item (1)(a)**):

- David Charles Hawkins, White Rock, South Surrey, British Columbia, CANADA
- Dr. Anthony Fauci, National Institute of Health, Rockville, Maryland
- Special Agent Britany Custer, Federal Bureau of Investigation
- Colin Sullivan, Legal Counsel, PATREON, INC., San Francisco, California
- Corean Elizabeth Stoughton (aka "DEEP NSA"), Hanover, Maryland
- George Webb Sweigert (3<sup>rd</sup> party defendant), Cobb Island, Maryland

3. The Plaintiff seeks to bring full disclosure of relevant discovery issues to the Court's attention with this letter, for the purpose of providing the Defendant adequate notice as to the Plaintiff's insistence on the inclusion of the following witnesses:

- Manuel Chavez, III, (3<sup>rd</sup> party defendant), Carson City, Nevada
- Robert David Steele, (3<sup>rd</sup> party defendant), Oakton, Virginia

4. A cornerstone issue before this Court is the Defendant's claims that the Plaintiff has been working as part of a secretive cartel "in collusion" with Mr. Chavez and Mr. Steele. Both of these men have now become known as notorious Internet provocateurs in the eyes of hundreds of thousands of people thanks to the recent **VICE NEWS** documentary on the origins of the "QAnon" conspiracy theory.

5. In an unrelated lawsuit, dismissed without prejudice and later refiled in the Eastern District of Virginia (*Steele v. Goodman*), the Defendant filed before that court **ECF Doc. No. 134**, para. 13, concerning information about an alleged "treasure trove" of e-mail messages provided by Mr. Chavez that included e-mail messages from "Thomas Schoenberger", quoted in relevant part below.

13. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal emails with Defendant. Among these were messages Chavez claims are communications  
DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 7

from Thomas Shoenberger, an individual unknown to Defendant who may in fact be highly placed in the organization of the monetized conspiracy to harass and defame Defendant Goodman. The emails from Shoenberger provide talking points for a plan to attack Defendant Goodman's reputation with false allegations claiming Goodman is an agent of Israel and / or paid by Mossad.

6. Mr. Schoenberger (Provo, Utah) has been identified by the Defendant as an associate of Mr. Chavez and Mr. Steele (and allegedly the Plaintiff) in at least a dozen motions and pleadings before this Court. This Schoenberger & Chavez linkage has also been documented in two (2) other pending non-related lawsuits (California, Florida). Mr. Schoenberger has also been featured in the **VICE NEWS** documentary as to collaborations with Mr. Chavez and Mr. Steele about the origins of the "QAnon" conspiracy theory (presumably linked to the civilian stampede on the U.S. Capitol, January 6, 2021). None of this has anything to do with the Plaintiff.

7. The Defendant has stated in innumerable video podcasts (as well as in a dozen motions filed with this Court) that the Plaintiff is a "business associate" or "co-conspirator" with either Mr. Schoenberger, and/or Mr. Chavez, and/or Mr. Steele.

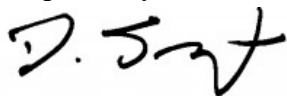
8. In fact, the Defendant has stated in public podcast videos that he had sought out Special Agent Brittany Custer, F.B.I., in April 2018 to discuss this conspiracy. The Defendant used the euphemism “decentralized, distributed defamation campaign” to very publicly allege criminal violations against several individuals – to include the Plaintiff. At the time, the Defendant claims (as stated in the E.D.V. ECF no 134) that there was an “*organization of the monetized conspiracy to harass and defame Defendant Goodman*”.

9. Plaintiff claims that e-mail messages provided to the Defendant, by Mr. Chavez, exonerate the Plaintiff from the Defendant’s claims of involvement in such a conspiracy. The Plaintiff also claims that the Defendant knew these allegations about the Plaintiff (described above) were baseless and lacked no foundation, and that the Defendant proceeded with reckless disregard of this knowledge. Plaintiff claims this multi-year smear campaign constitutes defamation *per se* and libel *per se*.

10. For the foregoing reasons, the Plaintiff seeks to add Mr. Chavez and Mr. Steele to the proposed witness list so that they may clear the name of the Plaintiff once and for all. **Enough is Enough.**

11. Artifacts are attached to this letter to refresh the Defendant’s knowledge of Mr. Chavez.

Respectfully,

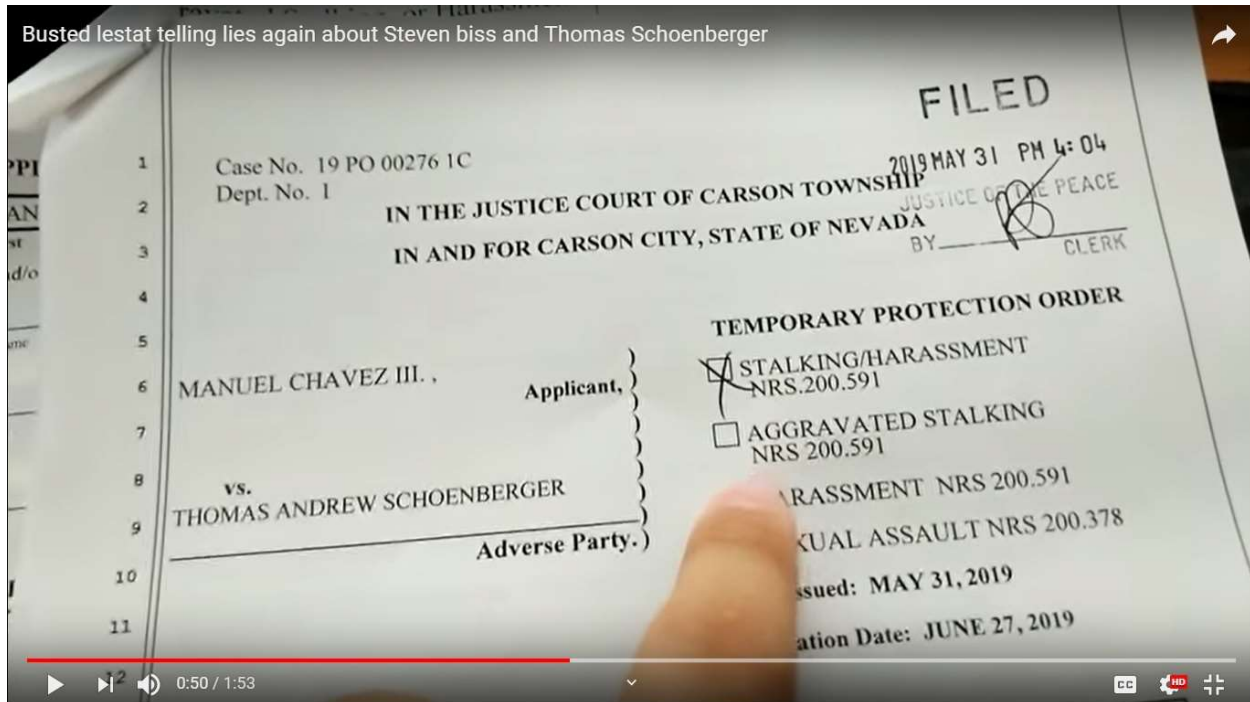
A handwritten signature in black ink, appearing to read "D. Sweigert", with a stylized flourish at the end.

D. George Sweigert

(attachments)

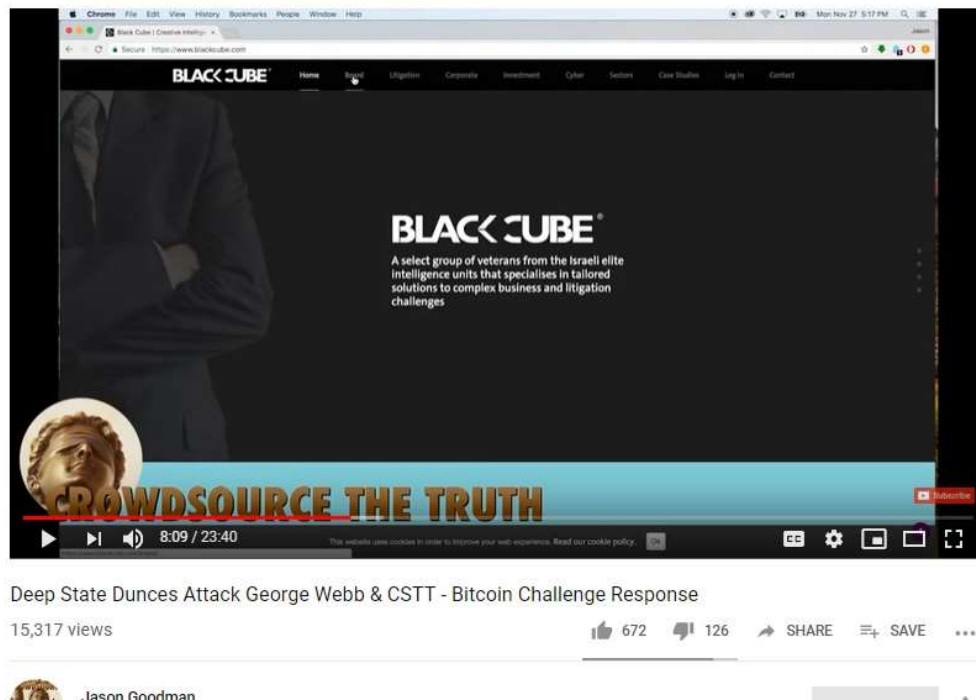
## EXHIBITS

As shown below, Temporary Restraining Order (TRO) against Mr. Shoenberger filed by Mr. Chavez in the courts of Carson City, Nevada (Case No. 19 PO 00276 1C).



Published on Jun 24, 2019, Internet URL: <https://www.youtube.com/watch?v=svJhLWwExWw>

Defendant's first, of nearly 50-60 videos, that conflates Plaintiff with Mr. Chavez and Mr. Steele.



## Deep State Dunces Attack George Webb & CSTT - Bitcoin Challenge Response

Jason Goodman

Streamed 1 year ago • 15,315 views

The dumbest affiliates of the Deep State simply will not give up their ludicrous attacks on the truth, while simultaneously offering no evidence to support their claims.

Streamed live on Nov 27, 2017

The dumbest affiliates of the Deep State simply will not give up their ludicrous attacks on the truth, while simultaneously offering no evidence to support their claims.

Internet URL: <https://www.youtube.com/watch?v=GNxCk6nqFJg>

**CERTIFICATE OF SERVICE**

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the twenty sixth day (26<sup>th</sup>) of February, two thousand and twenty-one (2021).

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|---|---|
| <b>Clerk of the Court, Room 200<br/>U.S. District Court 500 Pearl Street<br/>New York, New York 10007-1312<br/>EMAIL:<br/>temporary_pro_se_filing@nysd.uscourts.gov</b> | <b>Jason Goodman, CEO<br/>Multimedia System Design, Inc.<br/>252 7<sup>th</sup> Avenue, Apart. #6S<br/>New York, NY 10001<br/>truth@crowdsourcethetruth.org</b> |
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